

Timothy J. Fransen, OSB No. 073938

[tfransen@cosgravelaw.com](mailto:tfransen@cosgravelaw.com)

COSGRAVE VERGEER KESTER LLP

900 SW Fifth Avenue, 24<sup>th</sup> Floor

Portland, Oregon 97204

Telephone: (503) 323-9000

Facsimile: (503) 323-9019

Attorneys for Defendant National Association of Independent Landlords, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORLAND DIVISION

SAMANTHA JOHNSON

Plaintiff,

v.

TRANSUNION RENTAL SCREENING  
SOLUTIONS, INC., and NATIONAL  
ASSOCIATION OF INDEPENDENT  
LANDLORDS, INC.,

Defendants.

Case No. 3:19-CV-00661-JR

**DECLARATION OF TIMOTHY J.  
FRANSEN IN SUPPORT OF MOTION  
TO EXTEND PRETRIAL DEADLINES**

I, Timothy J. Fransen, hereby declare:

1. I am the attorney representing defendant National Association of Independent Landlords, Inc. ("National") in this case.
2. Since the initiation of this case, National has sought to pursue early settlement with plaintiff. To facilitate early settlement, National and plaintiff exchanged informal discovery in October 2019. Since then, the parties have exchanged extensive written settlement offers and have had multiple phone calls to discuss the potential to settle the case. Despite all this, at this time, it appears that settlement is not feasible.

3. Meanwhile, National understands that plaintiff has very recently agreed to a settlement with defendant TransUnion Rental Screening Solutions, Inc. ("TransUnion"). At the

time of this settlement, TransUnion had pending discovery requests served on plaintiff, but those requests have been withdrawn due to the settlement.

4. In order to avoid unnecessary, duplicative expenses (which would have the result of increasing plaintiff's settlement demands), National has not yet served formal discovery requests on plaintiff (which will mostly mirror the requests of TransUnion anyway).

5. I have conferred with plaintiff's counsel, and plaintiff opposes the motion. TransUnion does not oppose the motion.

6. Accordingly, defendant requests that the court extend the pretrial deadlines as indicated in its motion.

7. This motion is made in good faith and not for any improper purpose.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

DATED: January 24, 2020

*s/ Timothy J. Fransen*  
\_\_\_\_\_  
Timothy J. Fransen

## CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing **DECLARATION OF TIMOTHY J. FRANSEN IN SUPPORT OF MOTION TO EXTEND PRETRIAL DEADLINES** on the date indicated below by:

- mail with postage prepaid, deposited in the US mail at Portland, Oregon,
- hand delivery,
- facsimile transmission,
- overnight delivery,
- electronic filing notification.

If served by facsimile transmission, attached to this certificate is the printed confirmation of receipt of the document(s) generated by the transmitting machine. I further certify that said copy was placed in a sealed envelope delivered as indicated above and addressed to said attorney(s) at the address listed below:

Robert S. Sola  
Robert S. Sola, P.C.  
1500 SW First Avenue, Suite 800  
Portland, Oregon 97201

Kelly D. Jones  
Kelley D. Jones, Attorney at Law  
819 SE Morrison Street, Suite 255  
Portland, Oregon 97214  
Attorneys for Plaintiff

Nicholas J. Henderson  
Motschenbacher & Blattner, LLP  
117 SW Taylor St., Suite 300  
Portland, Oregon 97204  
Attorney for Defendant TransUnion Rental  
Screening Solutions, Inc.

James L. Policchio  
Schuckit & Associates, P.C.  
4545 Northwestern Drive  
Zionsville, IN 46077  
Attorney for Defendant National Association  
of Independent Landlords, Inc.

DATED: January, 24 2020

*s/ Timothy J. Fransen*  
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Timothy J. Fransen